

**Division Of State Patrol
Informational Memorandum**

6-99-3

**Manual Tab 4
School Bus Inspection Manual**

Topic: Restraint Systems Required In A School Bus

Background: Several questions typically get raised when talking about restraint system requirements in a school bus. **First** is that, "Why are school buses not required to have seat belts?" **Second** is, "How come my new school bus came without a shoulder harness for the driver?" **Third** is, the often-asked question of, "Is there suppose to be a shoulder harness for the occupant of a wheel chair?". **Fourth**, "Does a child safety restraint system have to be used for a child less than four years old"? **Fifth** is, "Why does my small school buses come with seat belts installed?"

Decision for Question 1: The benefits of compartmentalization, at this point, outweigh the effectiveness of seat belts in this type of vehicle. The specifications for compartmentalization can be found in S5 of FMVSS.222.

Decision for Question 2: S5.1.4(b)(1)(B) of FMVSS 571.222 refers to S4.4.3.3 of 571.208 which requires a shoulder harness for the driver and right side front passenger, if equipped, only if the school bus has a GVWR of 10000 pounds or less. It is an option on school buses over 10000 pounds but is recommended to be used for all driver positions.

Decision for Question 3: Trans 300 adopted FMVSS 222 with a applicability date affecting vehicles placed in operation after January 17, 1994. The FMVSS 222 requires a Type 2 or 2a pelvic and upper torso restraint system for each occupant of a wheelchair.

Decision for Question 4: NHTSA sent out a letter recommending the use of safety restraint systems for children of this age but Wisconsin law does not require there use. Seat belts may be added for this purpose if a need arises.

Decision for Question 5: Manufacturers are following specifications under S4.4.3.3 of FMVSS 571.208 requiring them to equip any school bus with a gross vehicle weight rating of 10000 pounds or less with Type 1 seat belt assemblies at all designated seating positions. Wisconsin law does not require these seat belts to be worn but it is suggested.

Issued May 1, 1999/BA